1 The Honorable James L. Robart 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 RICKEY P. MOORE, CASE NO. C19-1717-JLR 10 Plaintiff, STIPULATED MOTION AND 11 v. PROPOSED ORDER FOR TEMPORARY STAY UNITED STATES OF AMERICA, 12 OF CASE 13 Defendant. Noted for consideration: December 27, 2019 14 15 16 JOINT STIPULATED MOTION 17 The parties, by and through their counsel of record, hereby STIPULATE AND AGREE that this case should be stayed for good cause, and respectfully move this Court to stay this case 18 for 60 days, from December 27, 2019 until February 25, 2020. The parties agree that good cause 19 exists for the stay because defendant has represented to plaintiff that he will be granted the relief 20 he seeks from this lawsuit, but the parties need additional time to finalize processing of plaintiff's 21 request. Once plaintiff has received the relief he seeks, the parties will immediately notify the 22

Court and plaintiff will voluntarily dismiss this case. If for any reason plaintiff believes that

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UNITED STATES ATTORNEY 700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271 206-553-7970

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1	defendant has not granted the relief he seeks from this lawsuit by February 25, 2020, the parties	
2	will also notify the Court, and defendant will respond to plaintiff's complaint by February 25,	
3	2020. Accordingly, the parties respectfully request that the Court grant this stipulated motion.	
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5	DATED this 27th day of December, 2019.	
6	VITALIY KERTCHEN, ESQ.	BRIAN T. MORAN
7	VIIII KERTOIIEN, BSQ.	United States Attorney
8	s/ Vitaliy Kertchen VITALIY KERTCHEN, WSBA No. 45183	<u>s/Kristen R. Vogel</u> KRISTEN R. VOGEL, NYBA No. 5195664
9	Kertchen Law PLLC 917 S 10 <sup>th</sup> St.	Assistant United States Attorney United States Attorney's Office
10	Tacoma, WA 98405	700 Stewart Street, Suite 5220
	Phone: (253) 905-8415	Seattle, WA 98101-1271
11	Email: <u>vitaliy@kertchenlaw.com</u>	Phone: 206-553-7970
10	Attornory for Digintiff	Fax: 206-553-4067
12	Attorney for Plaintiff	Email: <u>kristen.vogel@usdoj.gov</u>
13		Attorney for Defendant
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24	STIPULATION AND PROPOSED ORDER FOR	UNITED STATES ATTORNEY

TEMPORARY STAY OF CASE [CASE NO. C19-1717-JLR] - 2

UNITED STATES ATTORNEY 700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271 206-553-7970

**ORDER** The parties having so stipulated and agreed, it is hereby SO ORDERED that this case is stayed until February 25, 2020. January, 2020. day of December, 2019/ JAMES L. ROBART United States District Judge